

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Richmond Division**

-----X		
In re:	:	Chapter 11
	:	
CIRCUIT CITY STORES, INC., <u>et al.</u>,	:	Case No. 08-35653-KRH
	:	
	:	Jointly Administered
Debtors.	:	
-----X		

**RESPONSE OF GENERATION H ONE AND TWO LIMITED PARTNERSHIP TO THE
LIQUIDATING TRUST'S TWENTY-FIRST OMNIBUS
OBJECTION TO LANDLORD CLAIMS**

Generation H One and Two Limited Partnership ("Generation H"), hereby responds to the Liquidating Trust's Twenty-First Omnibus Objection to Landlord Claims (the "Twenty-First Omnibus Objection") as follows:

1. Generation H prepared and filed a proof of claim for administrative expenses filed as number 13635 ("Claim 13635"), which claim seeks payment of \$172,247.60) for payment of administrative expenses. Claim 13635 was filed on June 26, 2009.

2. Exhibit E to the Twenty-First Omnibus Objection proposes to expunge in its entirety Claim 13635 on the basis that the claim lacks support of the amount asserted. Generation H has attached to this Response an exhibit detailing by item the components of its administrative expense claim. It will provide the underlying documentation to counsel to the Liquidating Trust in the immediate future.

Augustus C. Epps, Jr., Esquire (VSB No. 13254)
Michael D. Mueller, Esquire (VSB No. 38216)
Jennifer M. McLemore, Esquire (VSB No. 47164)
CHRISTIAN & BARTON, LLP
909 East Main Street, Suite 1200
Richmond, Virginia 23219
Telephone: (804) 697-4100
Facsimile: (804) 697-4112

Counsel for Starpoint Properties LLC

WHEREFORE, Generation H respectfully requests that the Court enter an order scheduling a hearing on the Twenty-First Omnibus Objection's proposed treatment of Claim 13635, allowing Claim 13635 as requested herein; overruling the Twenty-First Omnibus Objection as it pertains to Claim 13635 and for such other and further relief as the Court may deem proper and just under the circumstances.

Dated: April 7, 2011

CHRISTIAN & BARTON, LLP

/s/ Augustus C. Epps, Jr.

Augustus C. Epps, Jr., Esquire (VSB No. 13254)
Michael D. Mueller, Esquire (VSB No. 38216)
Jennifer M. McLemore, Esquire (VSB no. 47164)
909 East Main Street, Suite 1200
Richmond, VA 23219
Telephone: (804) 697-4100
Facsimile: (804) 697-6112

***Counsel for Generation H One and Two Limited
Partnership***

CERTIFICATE OF SERVICE

I hereby certify that on the 7th day of April 2011, a true and correct copy of the foregoing Response has been served electronically using the ECF system on all registered users of the CM/ECF system who have filed notices of appearance in this matter.

/s/ Augustus C. Epps, Jr.

1142630